

## REMARKS

Applicants thank Examiner O'Hern for his consideration of the response filed April 22, 2011, and for his telephone discussions with the undersigned counsel on May 5, 2011, and May 12, 2011. This amendment is supplemental to the response filed April 22, 2011. Entry of this amendment is respectfully requested.

### Summary of Telephone Interviews

In both the May 5, 2011, and the May 12, 2011, telephone interviews, the undersigned counsel and Examiner O'Hern discussed possible amendments to Claims 1, 11, and 19. Applicants believe that the claims as amended on April 22, 2011, sufficiently defined the claimed invention over the cited art. However, in the telephone interviews, the Examiner indicated that certain clarifications would be helpful. By this amendment, applicants have amended Claims 1, 11, and 19 to clarify that the wires of the first and second rigidifying grids have a relative spacing between approximately 2 to 4 inches. These amendments are made without disclaimer or disavowal of subject matter that applicants have claimed or are entitled to claim.

### Patentability of the Claims

Claims 1 and 4–19 are pending in the present application. Reconsideration of the claims and allowance of the application is requested in view of the amendments submitted herewith. None of the cited Bickett, Crook, and Kent references, alone or combined, disclose a rubber access mat or a roadway as claimed in the present application.

At most, Bickett teaches a "mold." Bickett does not teach anything about the structure of a mat or a roadway. Moreover, the grid in Bickett occupies a single plane, unlike the first and second rigidifying grids in the present application. Bickett also fails to teach or suggest first and

second rigidifying grids made of wires having a relative spacing between approximately 2 to 4 inches.

Kent does not teach a mat or roadway, as claimed in the present application. Instead, Kent teaches a "ballistic target." A person of ordinary skill in the art of access mats or roadways would not combine the teachings of Kent with those of Bickett. Additionally, the teachings of Crook do not overcome the deficiencies of Bickett and Kent.

For at least the foregoing reasons and for the reasons set forth in applicants' amendment filed April 22, 2011, the claim rejections under 35 U.S.C. § 103(a) should be withdrawn.

In applicants' April 22, 2011, amendment, applicants added independent Claim 19 which is directed to a roadway for vehicles and people. Claim 19 recites features that distinguish the claimed invention over the prior art for at least the same reasons as Claims 1 and 11. Accordingly, it is submitted that Claim 19 is also allowable over the prior art.

#### CONCLUSION

The present application is in condition for allowance. Applicant, therefore, requests the early issuance of a Notice of Allowance.

Respectfully submitted,

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